

REMARKS

Applicants appreciate the thorough examination of the present application as evidenced by the final Office Action of August 3, 2007 (hereinafter "Office Action") and the Advisory Action of October 22, 2007 (hereinafter "Advisory Action"). Applicants also appreciate the courtesy extended by Examiner Jackson to Applicants' representative during the telephone Interview of September 10, 2007.

In response, Applicants have amended independent Claim 20 to include the recitations of dependent Claims 21 and 22, which have been canceled. Also, Claim 39 has been amended to recite a "mobile phone handset" and "a speech generating device built into the mobile phone handset", as described in the present specification, for example, at Page 5, lines 17-19. Claim 19 has been similarly amended to clarify that "the display and the control unit are built into the apparatus", as shown, for example, in Figure 4 of the present specification. In addition, new dependent Claims 40-43 have been added, which include recitations similar to those of Claims 20, 24, 25, and 33. Claims 11, 13, 30, and 32 have also been amended to correct minor antecedent basis errors therein. No new matter has been added.

Accordingly, Applicants hereby request entry of the present Amendment and further consideration of the pending claims in view of the comments that follow.

Interview Summary

Applicants wish to thank the Examiner for discussing the rejections of the pending claims with Applicants' representative on September 10, 2007; however, no agreement was reached. Applicants respectfully submit that the above constitutes a complete interview summary pursuant to MPEP §713.04.

Applicants' Claim for Priority

The Office Action acknowledges Applicants' claim for foreign priority based on European Applications 02445177.5 (filed December 16, 2002) and 03011580.2 (filed May 22, 2003), and U.S. Provisional Patent Application 60/474,025 (filed May 29, 2003), but contends that the Applicants have not filed certified copies of these applications as required

by 35 USC §119(b). *See* Office Action, Page 2.

In response, Applicants filed certified copies of the requested priority documents with the USPTO on October 11, 2007, which currently appear in PAIR with a mail room date of October 15, 2007. Accordingly, Applicants respectfully request withdrawal of the objections on these grounds.

Independent Claim 39 Is Patentable Over Ryu

Independent Claim 39 stands rejected under 35 USC §102(e) as being anticipated by Ryu. Amended Claim 39 recites:

39. **A mobile phone handset, comprising:**
a display configured to display various readable data;
a speaker;
a speech generating device built into the mobile phone handset
including a conversion circuit therein configured to convert received data to a speech signal and provide the speech signal to the speaker; and
a control unit configured to extract at least a part of the displayed data and send the extracted part of the displayed data to the speech generating device.

The Office Action asserts that Ryu discloses all of the recitations of Claim 39. *See* Office Action, page 4.

Applicants respectfully disagree, as the cited portions of Ryu fail to disclose or suggest a "mobile phone handset" including all of the recitations of amended Claim 39. Ryu describes a system where a mobile telephone handset 100 can be connected to an external hands free kit 200 via a cable to provide hands free operation of the handset 100, for example, while operating a vehicle. *See* Ryu, Col. 2, lines 39 to 43 and Fig. 1. As illustrated in Figure 2 of Ryu, the mobile phone handset 100 includes a speaker SP1 and a display 30 that is configured to display a received short message. *See also* Ryu, Fig. 4, step 402. The mobile phone handset 100 further includes a control unit 10 that is configured to transmit the short message to a hands free kit 200 through a hands free cable. *See also* Ryu, Fig. 4, step 405. However, nowhere do the cited portions of Ryu disclose or suggest that the mobile telephone handset 100 includes "a speech generating device built into the mobile phone", as recited in Claim 39. Rather, Figure 3 of Ryu illustrates that a speech synthesizer module 150

configured to synthesize speech from a received short message is included *in the hands free kit* 200, not in the mobile telephone handset 100. *See also* Ryu, Fig. 4, step 419.

Thus, Ryu fails to disclose or suggest a mobile phone handset including "a speech generating device built into the mobile phone handset", as recited in amended Claim 39. Accordingly, Applicants respectfully submit that Claim 39 is patentable over Ryu for at least these reasons. Also, new Claims 40-43 are patentable at least per the patentability of Claim 39 from which they depend.

Independent Claims 1 and 20 Are Patentable Over Freeland and Kirby

The remaining independent claims stand rejected under 35 USC § 103(a) as being obvious over PCT Published International Application Publication No. WO 01/57851 to Freeland et al. (hereinafter "Freeland") in view of Kirby. Claim 1, for example, recites:

1. An apparatus, comprising:
a display configured to display various readable data; and
a control unit configured to extract at least a part of the displayed data and **configured to send the extracted part of the displayed data to a speech generating device** that is configured to generate speech from the extracted part of the displayed data,
wherein the speech generating device is attachable to the apparatus, and **wherein the control unit is configured to send** the extracted part of the displayed data to the speech generating device **at a fixed and/or controllable rate based on user interaction with the display** comprising scrolling and/or voice control input received from a user.

In its rejection of Claim 1, the Office Action concedes that Freeland fails to disclose or suggest that "the speech generating device is attachable to the apparatus" and "the control unit is configured to send the extracted part of the displayed data to the speech generating device at a fixed and/controllable rate based on user interaction with the display". Office Action, page 5. As such, the Office Action relies on Kirby to provide the missing recitations. See Office Action, pages 5-6.

However, Kirby relates to a prompting system that is configured to identify the words spoken by a presenter and control the scrolling of text based on the speed at which the text is spoken, i.e., a method of *displaying text to be spoken* by a speaker. *See* Kirby, Col. 1, lines 6-

7. More particularly, as described in Kirby, "[t]he controller 20 receives...a signal representing the newsreader's speech...the electrical signal representative of the speech is applied to a speech/text matching unit 26, which uses known speech recognition techniques to recognise the words being spoken and match them with the text being displayed...[i]n this way the displayed text keeps in step with the newsreader." Kirby, Col. 2, lines 49 – 62. In other words, Kirby describes that the controller 20 is configured to control scrolling in a display based on the rate of speech, not sending text to a speech generating device (for conversion into speech) based on the rate of scrolling. Indeed, the cited portions of Kirby do not contain any mention of sending displayed data to a speech generating device, as alleged by the Office Action. *See* Office Action, pages 5-6. Accordingly, nowhere do the cited portions of Kirby disclose or suggest that the controller 20 "is configured to send the extracted part of the displayed data to the speech generating device at a fixed and/or controllable rate based on user interaction with the display", as recited by Claim 1.

Moreover, Applicants submit that Kirby teaches away from the recitations of Claim 1. In particular, Kirby relates to visually displaying text to be spoken, while some embodiments of the present invention provide text-to-speech conversion "for the visually impaired and for users who need to focus on other things while using the phone, for instance car drivers". Specification, Page 4, lines 30-31. In other words, as Kirby is directed to providing text based on speech, Applicants submit that Kirby teaches away from providing speech from text, as described in the present specification and recited in Claim 1.

Accordingly, Applicants submit that the combination of Freeland and Kirby fails to disclose or suggest all of the recitations of Claim 1, and that Claim 1 is patentable for at least the above reasons. Amended Claim 20 includes similar recitations, and is thus patentable for at least similar reasons. Also, dependent Claims 2-7, 9-19, 23-35, and 37 are patentable at least per the patentability of Claims 1 and 20 from which they depend.

Many of the Dependent Claims Are Separately Patentable

As noted above, each of the dependent claims is patentable least per the patentability of independent Claims 1, 20, and 39 from which it depends. However, applicants submit that several of the dependent claims are separately patentable.

For example, Claim 40 recites, in part, that the control unit is configured to send data to the speech generating device "at a fixed and/or controllable rate based on user interaction with the display comprising a scrolling input received from a user." The Office Action asserts that Kirby discloses these recitations; however, as noted above with reference to Claim 1, Kirby describes controlling the scrolling of text in a display based on the rate of speech, not controlling the transmission of text for conversion to speech based on the rate of scrolling in the display. Accordingly, Applicants submit that Claim 40 is separately patentable for at least these reasons.

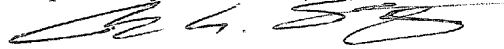
In addition, Claim 42 recites, in part, that the control unit is configured to send data to speech generating device "responsive to input of spaces and/or punctuation marks." However, none of the cited portions of Ryu, Freeland, and/or Kirby disclose or suggest using the entry of spaces and/or punctuation marks to control the transmission of data to a speech generating device. Thus, Applicants submit that Claim 42 is separately patentable for at least the above reasons. Claims 6 and 25 include similar recitations, and are therefore also patentable for at least similar reasons.

In re: Kerimovska et al.
Serial No.: 10/539,238
Filed: April 10, 2006
Page 14

Conclusion

Accordingly, based on the above amendments and remarks, Applicants submit that the pending claims are now in condition for allowance. Thus, Applicants respectfully request allowance of these claims and passing the application to issue. Applicants encourage the Examiner to contact the undersigned to resolve any remaining issues.

Respectfully submitted,

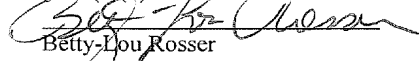


Rohan G. Sabapathypillai
Registration No. 51,074

USPTO Customer No. 54414
Myers Bigel Sibley & Sajovec
Post Office Box 37428
Raleigh, North Carolina 27627
Telephone: 919/854-1400
Facsimile: 919/854-1401

**CERTIFICATION OF ELECTRONIC TRANSMISSION
UNDER 37 CFR § 1.8**

I hereby certify that this correspondence is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4) to the U.S. Patent and Trademark Office on November 2, 2007.



Betty-Lou Rosser
Date of Signature: November 2, 2007